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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	Case No. 4:21-mj-71795-MAG
)	
Plaintiff,)	STIPULATION AND PROTECTIVE ORDER
)	(AS MODIFIED)
v.)	[Typo. fixed in the footnote on page 4 - "but"
)	changed to "must"]
KAMERON PATRICIA REID,)	
)	
Defendant.)	

With the agreement of the parties, the Court enters the following Protective Order:

Defendant is charged with Title 21 United States Section 841(a)(1), (b)(1)(C). Upon receipt of a discovery request, the United States will produce documents and other materials pertaining to the defendant and the charged offense to defense counsel. The discovery to be provided includes documents or other materials falling into one or more of the following categories (collectively, "Protected Information"):

1. Personal Identifying Information of any individual (other than his or her name), including without limitation any person's date of birth, social security number, residence or business address, telephone numbers, email addresses, driver's license number, professional license

- 1 number, family members names, or criminal histories (“Personal Identifying Information”);
- 2 2. Financial information of any individual or business, including without limitation bank
- 3 account numbers, credit or debit card numbers, account passwords, contact information, and
- 4 taxpayer identification numbers (“Financial Information”);
- 5 3. Medical records or other patient information of any individual covered by the Health
- 6 Insurance Portability and Accountability Act of 1996 (HIPAA) (“Medical Information”);
- 7 4. Sealed court filings that contain information regarding third parties that are targets or
- 8 potential targets of investigation, including the following types of documents if they contain
- 9 such information: sealed applications, affidavits, and orders authorizing search warrants;
- 10 applications for and orders authorizing the interception of wire and electronic
- 11 communications; pen register and trap and trace applications and orders, applications for and
- 12 orders authorizing the provision of information pursuant to 18 U.S.C. § 2703(d); and
- 13 applications for and orders authorizing investigative process pursuant to the All Writs Act
- 14 (“Investigatory Materials”); and
- 15 5. Audio and/or video recordings involving confidential sources, cooperating witnesses, and/or
- 16 undercover officers or agents (“CS/UC Information”).

17 The United States will identify discovery materials as Protected Information by marking such
 18 materials “CONFIDENTIAL– SUBJECT TO PROTECTIVE ORDER” or by providing written notice
 19 identifying discovery materials as Protected Information.

20 To ensure that Protected Information is not subject to unauthorized disclosure or misuse,

21 **IT IS HEREBY ORDERED** that defense counsel of record, their investigators, assistants,
 22 employees, and independent contractors (collectively, “the Defense Team”) may review with the
 23 defendant all discovery material produced by the government, but shall not provide a defendant with
 24 copies of, or permit defendant to make copies of, or have unsupervised access to, Investigatory Materials
 25 and/or CS/UC Information (without regard to whether counsel for defendant has redacted those
 26 materials) and any discovery material produced by the government that contains Personal Identifying
 27 Information, Financial Information, and/or Medical Information, unless the Personal Identifying
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1 Information, Financial Information, and/or Medical Information has first been **entirely redacted** from
2 the discovery materials. The government and defense counsel are ordered to work together to ensure
3 that these materials are protected, but that defendant has as much access to the materials as can be
4 provided consistent with this Court's order. Discovery material that clearly pertains to a specific
5 defendant and does not contain Protected Information regarding any other person (*e.g.*, defendant's own
6 bank records, telephone records, and business records) may be provided to that defendant unredacted,
7 with the exception of Investigatory Materials and CS/UC Information.

8 The Defense Team may show witnesses Personal Identifying Information, Financial Information,
9 and/or Medical Information in the course of preparing a defense if the witness, by reason of their
10 participation in the proceeding, would have seen or had reason to know such information. Witnesses
11 may only view Personal Identifying Information, Financial Information, and/or Medical Information in
12 the presence of the Defense Team. The Defense Team may make derivative use of the information
13 contained in Investigatory Materials and CS/UC Information to pursue investigative leads and question
14 witnesses in furtherance of preparing possible defenses. Regarding derivative use, the Defense Team
15 shall not disclose the source of said information in any way to witnesses (including that the information
16 came from government sources), or allow witnesses to view or have a copy of Investigatory Materials or
17 CS/UC Information.

18 Defense counsel may also provide unredacted copies of Protected Information to any experts
19 retained to assist with the preparation of the defense in the captioned case. The defendant, all members
20 of the defense team, and any experts who receive discovery under this Order shall be provided a copy of
21 this Order along with those materials and shall initial and date the order reflecting their agreement to be
22 bound by it.

23 The materials provided pursuant to this protective order may only be used for the specific
24 purpose of preparing or presenting a defense in this matter unless specifically authorized by the Court.

25 This Order shall also apply to any copies made of any materials covered by this Order.

26 **IT IS FURTHER ORDERED** that neither a defendant nor any member of the Defense Team
27 shall provide any Protected Information produced by the government to any third party (*i.e.*, any person
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1 who is not a member of the defense team), except in the manner described above with respect to
2 witnesses or experts, or make any public disclosure of the same, other than in a court filing, without the
3 government's express written permission or further order of this Court. If a party files a pleading that
4 contains or attaches Protected Information subject to this Order, the Protected Information must be filed
5 under seal.¹

6 **IT IS FURTHER ORDERED** that after any judgment or disposition has become final and there
7 are no pending appeals counsel for the defendant shall notify the government so that the government
8 may request Protected Information subject to this Protective Order (including any copies) be returned to
9 the United States or destroyed. Upon request of the United States, counsel for defendant shall return or
10 destroy materials subject to this Protective Order (including any copies) within 14 days, unless counsel
11 for defendant can ensure that the Protected Information will continue being kept under the conditions
12 specified in this Order. To the extent the Defense Team maintains possession of the Protected
13 Information, it agrees to do so under the conditions specified in this Order. If counsel for defendant
14 returns documents and materials subject to this Order to the United States, the United States shall
15 maintain those documents and materials until the period for filing a motion under 28 U.S.C. § 2255 has
16 expired. After the statutory period for filing a motion under 28 U.S.C. § 2255 has expired, the United
17 States is free to destroy documents and materials subject to this Order. If defendant is represented by
18 counsel and files a motion pursuant to 28 U.S.C. § 2255, the United States will provide counsel with the
19 documents and materials subject to this Protective Order under the terms of this Order.

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27 ¹ Any materials filed under seal must be filed in conformance with Criminal Local Rule 56-1.
28 The sealing request must be narrowly tailored to seek sealing only of the sealable materials.

1 This stipulation is without prejudice to either party applying to the Court to modify the terms of
2 any protective order. This Court shall retain jurisdiction to modify this Order upon motion of either
3 party even after the conclusion of district court proceedings in this case.

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5 **IT IS SO STIPULATED.**

STEPHANIE M. HINDS
United States Attorney

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8 Dated: January 18, 2022

/s/
MOLLY K. PRIEDEMAN
Assistant United States Attorney

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11 /s/
JOYCE LEAVITT
Counsel for Defendant Patricia Kameron Reid

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14 **IT IS SO ORDERED.**

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16 Dated: January 19, 2022

